

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA

Plaintiff

CRIMINAL NO. 21-030 (ADC)

v.

[2] MIGUEL SANTANA-AVILÉS

Defendant

MOTION TO VACATE SENTENCING HEARING

TO THE HONORABLE COURT:

COMES NOW defendant MIGUEL SANTANA-AVILÉS [2], through the undersigned attorney and very respectfully STATES, ALLEGES, and PRAYS:

1. This Honorable Court set Mr. Santana-Avilés' Sentencing Hearing for August 4, 2022.¹
2. Mr. Santana-Avilés is also indicted in criminal cases 18-808(DRD), 20-400(DRD), and 22-082(RAM).
3. He is awaiting to be sentenced in this case, in case 18-808, and in case 20-400; whereas plea negotiations are ongoing in case 22-082.
4. It should be noted that the Court in case 18-808 and in case 20-400 ordered that the sentencing hearings for both cases would be held jointly; the hearing was vacated *sine die* on March 23, 2022².
5. In all four cases, Santana-Avilés is being represented by the undersigned counsel.
6. Because it is in Santana-Avilés' best interests and in the best interests of justice, we requested that this case be consolidated so that it is merged into case 22-082³, given that said case is the only case in the pre-trial stage. We must note that motions to consolidate

¹ See Docket Entry No. 177.

² See Docket Entry No. 117 in case 18-808, and Docket Entry No. 17 in case 20-400.

³ See Docket Entry No. 178.

were also filed in all three cases, to wit, in case 18-808, 20-400, and 22-082 so that all cases would be merged into case 22-082.

7. Accordingly, we respectfully request that this Honorable Court vacates Santana-Avilés' Sentencing Hearing set for August 4, 2022.

WHEREFORE, it is respectfully requested that this Honorable Court takes notice of the above, GRANTS this motion, and VACATES the Sentencing Hearing, with any other order that this Court deems necessary.

I HEREBY CERTIFY that on this day, this motion was electronically filed using the CM/ECF filing system, which will send notification of such filing to all counsel of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico on July 27, 2022.

S/ Jason González Delgado
JASON GONZÁLEZ-DELGADO
USDC-PR NO. 217814
PO BOX 191365
San Juan, PR 00919-1365
787-536-5306
jasonfed@gmail.com